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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
GOOGLE LLC’S ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF  
GOOGLE LLC’S OPPOSITION TO  
PLAINTIFFS’ REQUEST FOR AN  
ORDER FOR GOOGLE TO SHOW  
CAUSE FOR WHY IT SHOULD NOT  
BE SANCTIONED FOR DISCOVERY  
MISCONDUCT**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Google LLC's Administrative Motion to Seal Portions Google's Submission in Google's Opposition to Plaintiffs' Request for an Order for Google to Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct ("Opposition"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Documents Sought to Be Sealed</b>	<b>Text to be Sealed</b>	<b>Reason(s) for Court's Ruling</b>
Google's Opposition for Sanctions	<p>Portions Highlighted in Yellow at:</p> <p>Pages i:5-7, i:10, i:12, i:14, i:21, 1:10-11, 1:13, 1:15, 1:25-28, 2:1-3, 2:7, 2:10, 2:27, 3:21, 4:3-4, 4:6-7, 4:12, 4:15, 4:19-20, 5:1-5, 5:9-10, 5:13, 5:24-25, 6:7-8, 6:10-11, 6:13-15, 6:18-23, 7:1-3, 7:10, 7:18-19, 7:21-23, 8:6-10, 8:12-13, 9:1, 9:3-17, 10:1, 10:4, 10:7, 10:10, 10:16-28, 11:1, 11:3-8, 12:15, 12:19-20, 13:4-15, 13:17, 13:19, 13:22-26, 14:1, 14:6-7, 14:27-28, 15:9, 15:15, 15:18, 15:20, 15:22, 15:26-28, 16:2, 16:6, 16:9-10, 16:12, 16:15, 18:7, 18:11, 18:28, 19:1, 19:3-4, 19:6, 19:12, 19:24, 19:27, 21:12, 21:14-17, 21:19, 22:2, 24:9-10, 25:13.</p>	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Ansorge Declaration	<p>Portions Highlighted in Yellow at:</p> <p>Pages 2:20, 2:23, 3:3, 3:10, 4:2, 4:11, 4:14, 4:17, 5:17, 5:24, 5:25, 5:27-28, 6:3-6, 6:8-12, 6:14-15, 7:1, 7:5-7, 7:13-14, 7:15, 7:21, 7:24-25, 7:28, 8:8, 8:13-14, 8:28, 9:14, 9:27, 10:6-7, 10:10-12, 10:18, 10:25, 10:27-28, 11:2-4, 11:11, 11:19-20, 11:22-23, 12:11, 12:18-20, 13:10, 13:16-17, 13:22-23, 14:1, 14:14-15, 14:17, 14:20, 14:27, 15:14, 15:25, 16:4, 16:14</p>	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

1	Exhibit 3 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
2	Ansorge		technical information regarding highly
3	Declaration in	Pages 66:5, 67:18	sensitive features of Google's internal
4	support of		systems and operations, including details
5	Google's		related to data signals and logs, and their
6	Opposition to		proprietary functionalities, that Google
	Plaintiffs' Request		maintains as confidential in the ordinary
	for Sanctions		course of its business and is not
			generally known to the public or
			Google's competitors.
7	Exhibit 4 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
8	Ansorge		technical information regarding highly
9	Declaration in	Page 2	sensitive features of Google's internal
10	support of		systems and operations, including details
11	Google's		related to internal data sources, that
	Opposition to		Google maintains as confidential in the
	Plaintiffs' Request		ordinary course of its business and is not
	for Sanctions		generally known to the public or
			Google's competitors.
12	Exhibit 5 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
13	Ansorge		technical information regarding highly
14	Declaration in	Pages 1-2	sensitive features of Google's internal
15	support of		systems and operations, including details
16	Google's		related to internal identifiers, data
17	Opposition to		signals, logs, and their proprietary
	Plaintiffs' Request		functionalities, that Google maintains as
	for Sanctions		confidential in the ordinary course of its
			business and is not generally known to
			the public or Google's competitors.
18	Exhibit 6 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
19	Ansorge		technical information regarding highly
20	Declaration in	Pages 1-2	sensitive features of Google's internal
21	support of		systems and operations, including details
22	Google's		related to project names, internal
23	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
24	Exhibit 7 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
25	Ansorge		technical information regarding highly
26	Declaration in	Page 1	sensitive features of Google's internal
27	support of		systems and operations, including details
28	Google's		related to internal data sources, that
	Opposition to		Google maintains as confidential in the
	Plaintiffs' Request		ordinary course of its business and is not
	for Sanctions		generally known to the public or

1			Google's competitors.
2	Exhibit 9 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
3	Ansorge	Page 1	technical information regarding highly
4	Declaration in		sensitive features of Google's internal
5	support of		systems and operations, including details
6	Google's		related to project names, internal
7	Opposition to		identifiers, data signals, logs, and their
8	Plaintiffs' Request		proprietary functionalities, as well as
9	for Sanctions		Google's internal practices with regard
10			to Incognito and its proprietary
11			functions, that Google maintains as
12			confidential in the ordinary course of its
13			business and is not generally known to
14			the public or Google's competitors.
15			
16	Exhibit 10 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect
17	Ansorge	Pages 1-2	confidential technical information
18	Declaration in		regarding highly sensitive features of
19	support of		Google's internal systems and
20	Google's		operations, including details related to
21	Opposition to		project names, internal identifiers, data
22	Plaintiffs' Request		signals, logs, and their proprietary
23	for Sanctions		functionalities, that Google maintains
24			as confidential in the ordinary course of
25			its business and is not generally known
26			to the public or Google's competitors.
27			
28			
	Exhibit 11 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
	Ansorge	Pages 1-8	technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to data signals, logs, and their
	Opposition to		proprietary functionalities, that Google
	Plaintiffs' Request		maintains as confidential in the ordinary
	for Sanctions		course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 12 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
	Ansorge	Page 1	technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, Google's
	for Sanctions		internal practices with regard to
			Incognito and its proprietary functions,
			that Google maintains as confidential in
			the ordinary course of its business and is
			not generally known to the public or

1			Google's competitors.
2	Exhibit 15 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
3	Ansorge	Pages 8-10	technical information regarding highly
4	Declaration in		sensitive features of Google's internal
5	support of		systems and operations, including details
6	Google's		related to project names, internal
7	Opposition to		identifiers, data signals, logs, and their
8	Plaintiffs' Request		proprietary functionalities, that Google
9	for Sanctions		maintains as confidential in the ordinary
10			course of its business and is not
11			generally known to the public or
12			Google's competitors.
13	Exhibit 16 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
14	Ansorge	Page 1	technical information regarding highly
15	Declaration in		sensitive features of Google's internal
16	support of		systems and operations, including details
17	Google's		related to data signals, logs, and their
18	Opposition to		proprietary functionalities, that Google
19	Plaintiffs' Request		maintains as confidential in the ordinary
20	for Sanctions		course of its business and is not
21			generally known to the public or
22			Google's competitors.
23	Exhibit 17 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
24	Ansorge	Pages 3-4	technical information regarding highly
25	Declaration in		sensitive features of Google's internal
26	support of		systems and operations, including details
27	Google's		related to internal identifiers, data
28	Opposition to		signals, logs, and their proprietary
	Plaintiffs' Request		functionalities, that Google maintains as
	for Sanctions		confidential in the ordinary course of its
			business and is not generally known to
			the public or Google's competitors.
	Exhibit 18 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
	Ansorge	Pages 2, 6-7, 10-11	technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 19 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to logs and their proprietary

1	Opposition to		functionalities, that Google maintains as
2	Plaintiffs' Request		confidential in the ordinary course of its
3	for Sanctions		business and is not generally known to
4	Exhibit 20 to	Redacted in its entirety	the public or Google's competitors.
5	Ansorge		Narrowly tailored to protect confidential
6	Declaration in		technical information regarding highly
7	support of		sensitive features of Google's internal
8	Google's		systems and operations, including details
9	Opposition to		related to logs and their proprietary
10	Plaintiffs' Request		functionalities, that Google maintains as
11	for Sanctions		confidential in the ordinary course of its
12			business and is not generally known to
13	Exhibit 21 to	Redacted in its entirety	the public or Google's competitors.
14	Ansorge		Narrowly tailored to protect confidential
15	Declaration in		technical information regarding highly
16	support of		sensitive features of Google's internal
17	Google's		systems and operations, including details
18	Opposition to		related to logs and their proprietary
19	Plaintiffs' Request		functionalities, that Google maintains as
20	for Sanctions		confidential in the ordinary course of its
21			business and is not generally known to
22	Exhibit 22 to	Redacted in its entirety	the public or Google's competitors.
23	Ansorge		Narrowly tailored to protect confidential
24	Declaration in		technical information regarding highly
25	support of		sensitive features of Google's internal
26	Google's		systems and operations, including details
27	Opposition to		related to project names, internal
28	Plaintiffs' Request		identifiers, data signals, logs, and their
	for Sanctions		proprietary functionalities, that Google
			maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 23 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 24 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details

1	Google's		related to project names, internal metrics,
2	Opposition to		internal identifiers, and their proprietary
3	Plaintiffs' Request		functionalities, that Google maintains as
4	for Sanctions		confidential in the ordinary course of its
5	Exhibit 25 to	Redacted in its entirety	business and is not generally known to
6	Ansorge		the public or Google's competitors.
7	Declaration in		Narrowly tailored to protect confidential
8	support of		technical information regarding highly
9	Google's		sensitive features of Google's internal
10	Opposition to		systems and operations, including details
11	Plaintiffs' Request		related to project names, internal metrics,
12	for Sanctions		internal identifiers, and their proprietary
13			functionalities, that Google maintains as
14			confidential in the ordinary course of its
15			business and is not generally known to
16			the public or Google's competitors.
17	Exhibit 26 to	Redacted in its entirety	Narrowly tailored to protect confidential
18	Ansorge		technical information regarding highly
19	Declaration in		sensitive features of Google's internal
20	support of		systems and operations, including details
21	Google's		related to project names, internal
22	Opposition to		identifiers, data signals, and their
23	Plaintiffs' Request		proprietary functionalities, that Google
24	for Sanctions		maintains as confidential in the ordinary
25			course of its business and is not
26			generally known to the public or
27			Google's competitors.
28	Exhibit 27 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to project names, and their
	Opposition to		proprietary functionalities, that Google
	Plaintiffs' Request		maintains as confidential in the ordinary
	for Sanctions		course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 28 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal metrics, project names,
	Opposition to		and their proprietary functionalities, that
	Plaintiffs' Request		Google maintains as confidential in the
	for Sanctions		ordinary course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 29 to	Redacted in its entirety	Narrowly tailored to protect confidential



1	Ansorge		technical information regarding highly
2	Declaration in		sensitive features of Google's internal
3	support of		systems and operations, including details
4	Google's		related to internal metrics, project names,
5	Opposition to		and their proprietary functionalities, that
6	Plaintiffs' Request		Google maintains as confidential in the
7	for Sanctions		ordinary course of its business and is not
8			generally known to the public or
9			Google's competitors.
10	Exhibit 30 to	Redacted in its entirety	Narrowly tailored to protect confidential
11	Ansorge		technical information regarding highly
12	Declaration in		sensitive features of Google's internal
13	support of		systems and operations, including details
14	Google's		related to internal metrics, project names,
15	Opposition to		and their proprietary functionalities, that
16	Plaintiffs' Request		Google maintains as confidential in the
17	for Sanctions		ordinary course of its business and is not
18			generally known to the public or
19			Google's competitors.
20	Exhibit 31 to	Redacted in its entirety	Narrowly tailored to protect confidential
21	Ansorge		technical information regarding highly
22	Declaration in		sensitive features of Google's internal
23	support of		systems and operations, including details
24	Google's		related to internal metrics, project names,
25	Opposition to		and their proprietary functionalities, that
26	Plaintiffs' Request		Google maintains as confidential in the
27	for Sanctions		ordinary course of its business and is not
28			generally known to the public or
			Google's competitors.
	Exhibit 32 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal metrics, project names,
	Opposition to		and their proprietary functionalities, as
	Plaintiffs' Request		well as internal metrics, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 33 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Ansorge		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal metrics, project names,
	Opposition to		and their proprietary functionalities, that
	Plaintiffs' Request		Google maintains as confidential in the
	for Sanctions		ordinary course of its business and is not



		generally known to the public or Google's competitors.
Exhibit 34 to Ansoerge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including the various types of data sources which include details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 35 to Ansoerge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 36 to Ansoerge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects and their proprietary functionalities, as well as, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 37 to Ansoerge Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal metrics, project names, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 38 to Ansoerge Declaration in support of Google's	Portions Highlighted in Yellow at:  Pages 8:12	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to data signals, logs, and their

1	Opposition to		proprietary functionalities, that Google
2	Plaintiffs' Request		maintains as confidential in the ordinary
3	for Sanctions		course of its business and is not
4	Exhibit 39 to	Redacted in its entirety	generally known to the public or
5	Ansorge		Google's competitors.
6	Declaration in		Narrowly tailored to protect confidential
7	support of		technical information regarding highly
8	Google's		sensitive features of Google's internal
9	Opposition to		systems and operations, including details
10	Plaintiffs' Request		related to internal data signals, logs, and
11	for Sanctions		their proprietary functionalities, that
12			Google maintains as confidential in the
13			ordinary course of its business and is not
14			generally known to the public or
15			Google's competitors.
16	Liao Declaration in	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
17	support of		technical information regarding highly
18	Google's	Pages caption page at line 21, 25,	sensitive features of Google's internal
19	Opposition to	1:4-5, 1:7-8. 1:12-15, 1:24, 1:25,	systems and operations, including details
20	Plaintiffs' Request	2:1-4, 2:9-11, 2:24, 2:25, 3:1-24,	related to project names, internal
21	for Sanctions	3:25, 4:1-24, 4:25, 5:1, 5:25	identifiers, and their proprietary
22			functionalities, that Google maintains as
23			confidential in the ordinary course of its
24			business and is not generally known to
25			the public or Google's competitors.
26	Leung Declaration	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
27	in support of		technical information regarding highly
28	Google's	Pages caption page at lines 20-21,	sensitive features of Google's internal
	Opposition to	25, 1:5-6, 1:9-17, 1:20-22, 1:25,	systems and operations, including details
	Plaintiffs' Request	2:10-12, 2:15-23, 2:25, 3:1-20,	related to project names, internal
	for Sanctions	3:25, 4:1-2, 4:5-6, 4:8-10, 4:25	identifiers, and their proprietary
			functionalities, that Google maintains as
			confidential in the ordinary course of its
			business and is not generally known to
			the public or Google's competitors.
	Golueke	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
	Declaration in		technical information regarding highly
	support of	Pages 1:22, 1:24, 2:12-13, 2:15-	sensitive features of Google's internal
	Google's	16, 2:20, 2:26-27, 3:1-2, 3:10,	systems and operations, including details
	Opposition to	3:25-26, 4:3-4, 4:6, 4:8, 4:13,	related to project names, internal
	Plaintiffs' Request	4:15-16	identifiers, data signals, data sources,
	for Sanctions		logs, and its proprietary functions, that
			Google maintains as confidential in the
			ordinary course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 1 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly

1	Declaration in		sensitive features of Google's internal
2	support of		systems and operations, including details
3	Google's		related to project names, internal
4	Opposition to		identifiers, as well as internal metrics
5	Plaintiffs' Request		and investigation into financial impact of
6	for Sanctions		certain features, that Google maintains as
7			confidential in the ordinary course of its
8			business and is not generally known to
9			the public or Google's competitors.
10	Exhibit 2 to	Redacted in its entirety	Narrowly tailored to protect confidential
11	Trebicka		technical information regarding highly
12	Declaration in		sensitive features of Google's internal
13	support of		systems and operations, including details
14	Google's		related to project names, internal
15	Opposition to		identifiers, as well as internal metrics
16	Plaintiffs' Request		and investigation into financial impact of
17	for Sanctions		certain features, that Google maintains as
18			confidential in the ordinary course of its
19			business and is not generally known to
20			the public or Google's competitors.
21	Exhibit 3 to	Redacted in its entirety	Narrowly tailored to protect confidential
22	Trebicka		technical information regarding highly
23	Declaration in		sensitive features of Google's internal
24	support of		systems and operations, including details
25	Google's		related to internal project names, internal
26	Opposition to		identifiers, internal metrics, and their
27	Plaintiffs' Request		proprietary functionalities, that Google
28	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 4 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal project names, internal
	Opposition to		identifiers, internal metrics, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 5 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal project names, internal
	Opposition to		identifiers, internal metrics, and their

1	Plaintiffs' Request for Sanctions		proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2			
3			
4	Exhibit 7 to Trebicka	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
5	Declaration in support of		
6	Google's		
7	Opposition to Plaintiffs' Request for Sanctions		
8			
9			
10	Exhibit 8 to Trebicka	Redacted in its entirety	Narrowly tailored to protect highly sensitive and confidential information regarding Google's internal systems and operations, including details related to employees and organizational structure, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
11	Declaration in support of		
12	Google's		
13	Opposition to Plaintiffs' Request for Sanctions		
14			
15	Exhibit 9 to Trebicka	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
16	Declaration in support of		
17	Google's		
18	Opposition to Plaintiffs' Request for Sanctions		
19			
20			
21	Exhibit 10 to Trebicka	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
22	Declaration in support of		
23	Google's		
24	Opposition to Plaintiffs' Request for Sanctions		
25			
26			
27			
28	Exhibit 11 to Trebicka	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly

1	Declaration in support of		sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, internal metrics and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
2	Google's		
3	Opposition to		
4	Plaintiffs' Request for Sanctions		
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6	Exhibit 12 to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including the various types of data sources which details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
7	Trebicka		
8	Declaration in support of		
9	Google's		
10	Opposition to		
11	Plaintiffs' Request for Sanctions		
12			
13	Exhibit 13 to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
14	Trebicka		
15	Declaration in support of		
16	Google's		
17	Opposition to		
18	Plaintiffs' Request for Sanctions		
19			
20	Exhibit 15 to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
21	Trebicka		
22	Declaration in support of		
23	Google's		
24	Opposition to		
25	Plaintiffs' Request for Sanctions		
26			
27	Exhibit 16 to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals, internal identifiers, and their proprietary
28	Trebicka		
	Declaration in support of		
	Google's		
	Opposition to		

1	Plaintiffs' Request for Sanctions		functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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3	Exhibit 17 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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10	Exhibit 18 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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16	Exhibit 19 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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23	Exhibit 20 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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2	Exhibit 21 to	Redacted in its entirety	Narrowly tailored to protect confidential
3	Trebicka		technical information regarding highly
4	Declaration in		sensitive features of Google's internal
5	support of		systems and operations, details related to
6	Google's		internal project names, internal
7	Opposition to		identifiers, internal metrics, and their
8	Plaintiffs' Request		proprietary functionalities, that Google
9	for Sanctions		maintains as confidential in the ordinary
10			course of its business and is not
11			generally known to the public or
12			Google's competitors.
13	Exhibit 22 to	Redacted in its entirety	Narrowly tailored to protect confidential
14	Trebicka		technical information regarding highly
15	Declaration in		sensitive features of Google's internal
16	support of		systems and operations, including details
17	Google's		related to internal project names, internal
18	Opposition to		identifiers, data signals, logs, and their
19	Plaintiffs' Request		proprietary functionalities, that Google
20	for Sanctions		maintains as confidential in the ordinary
21			course of its business and is not
22			generally known to the public or
23			Google's competitors.
24	Exhibit 23 to	Redacted in its entirety	Narrowly tailored to protect confidential
25	Trebicka		technical information regarding highly
26	Declaration in		sensitive features of Google's internal
27	support of		systems and operations, including details
28	Google's		related to internal project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 24 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 25 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly
	Declaration in		sensitive features of Google's internal

1	support of		systems and operations, including details related to internal project names, internal
2	Google's		identifiers, data signals, logs, and their
3	Opposition to		proprietary functionalities, that Google
4	Plaintiffs' Request		maintains as confidential in the ordinary
5	for Sanctions		course of its business and is not
6			generally known to the public or
7			Google's competitors.
8	Exhibit 26 to	Redacted in its entirety	Narrowly tailored to protect confidential
9	Trebicka		technical information regarding highly
10	Declaration in		sensitive features of Google's internal
11	support of		systems and operations, including details
12	Google's		related to internal project names, internal
13	Opposition to		identifiers, data signals, logs, and their
14	Plaintiffs' Request		proprietary functionalities, that Google
15	for Sanctions		maintains as confidential in the ordinary
16			course of its business and is not
17			generally known to the public or
18			Google's competitors.
19	Exhibit 27 to	Redacted in its entirety	Narrowly tailored to protect confidential
20	Trebicka		technical information regarding highly
21	Declaration in		sensitive features of Google's internal
22	support of		systems and operations, including details
23	Google's		related to internal project names, internal
24	Opposition to		identifiers, data signals, logs, and their
25	Plaintiffs' Request		proprietary functionalities, that Google
26	for Sanctions		maintains as confidential in the ordinary
27			course of its business and is not
28			generally known to the public or
			Google's competitors.
	Exhibit 28 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google
	for Sanctions		maintains as confidential in the ordinary
			course of its business and is not
			generally known to the public or
			Google's competitors.
	Exhibit 29 to	Redacted in its entirety	Narrowly tailored to protect confidential
	Trebicka		technical information regarding highly
	Declaration in		sensitive features of Google's internal
	support of		systems and operations, including details
	Google's		related to internal project names, internal
	Opposition to		identifiers, data signals, logs, and their
	Plaintiffs' Request		proprietary functionalities, that Google

1	for Sanctions		maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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3	Exhibit 30 to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
4	Trebicka		
5	Declaration in		
6	support of		
7	Google's		
8	Opposition to		
9	Plaintiffs' Request		
10	for Sanctions		
11	Exhibit 31 to	Redacted in its entirety	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
12	Trebicka		
13	Declaration in		
14	support of		
15	Google's		
16	Opposition to		
17	Plaintiffs' Request		
18	for Sanctions		
19	Exhibit 33 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
20	Trebicka	Page 2	
21	Declaration in		
22	support of		
23	Google's		
24	Opposition to		
25	Plaintiffs' Request		
26	for Sanctions		
27	Exhibit 34 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal metrics, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
28	Trebicka	Pages 2-7, 9-25	
	Exhibit 35 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential technical information regarding highly
	Trebicka		

1	Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Pages 2, 4	sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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6	Exhibit 36 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Portions Highlighted in Yellow at:  Pages 2	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, internal links, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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12	Exhibit 39 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Portions Highlighted in Yellow at:  Pages 102:12, 103:9, 261:10, 261:12, 261:17, 261:22, 262:1, 262:4-5, 262:7-8, 262:15-16, 262:20, 262:24	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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19	Exhibit 40 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request for Sanctions	Portions Highlighted in Yellow at:  Pages 131:19, 131:25, 132:5, 132:10-11, 132:15, 132:22, 133:4, 133:9, 133:12, 133:15, 133:19	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project names, internal identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
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24	Exhibit 41 to Trebicka Declaration in support of Google's Opposition to Plaintiffs' Request	Portions Highlighted in Yellow at:  Pages 57:19	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not
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1	for Sanctions		generally known to the public or Google's competitors.
2	Exhibit 42 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
3	Trebicka		technical information regarding highly
4	Declaration in	Pages 69:5-6, 69:8-10, 69:15-16,	sensitive features of Google's internal
5	support of	69:25, 70:1, 70:3, 70:5-6, 70:18,	systems and operations, including details
6	Google's	70:21, 70:23, 71:9, 72:20-22,	related to internal data signals, logs, and
7	Opposition to	72:24-25, 73:5-6, 73:14-15, 73:17,	their proprietary functionalities, that
8	Plaintiffs' Request	73:22, 75:17-20, 75:24-25, 76:1-2,	Google maintains as confidential in the
9	for Sanctions	76:13-14, 76:24-25, 77:8, 77:20-	ordinary course of its business and is not
10		23, 90:10-11, 91:2-4, 91:11-13,	generally known to the public or
11		91:17, 92:11	Google's competitors.
12	Exhibit 47 to	Portions Highlighted in Yellow at:	Narrowly tailored to protect confidential
13	Trebicka		technical information regarding highly
14	Declaration in	Pages 40:4, 40:23-24, 41:1, 41:3,	sensitive features of Google's internal
15	support of	41:15, 47:23-24, 48:6, 48:8-9,	systems and operations, including details
16	Google's	48:18	related to internal project names, data
17	Opposition to		signals, logs, and their proprietary
18	Plaintiffs' Request		functionalities, that Google maintains as
19	for Sanctions		confidential in the ordinary course of its
20	Exhibit 49 to	Portions Highlighted in Yellow at:	business and is not generally known to
21	Trebicka		the public or Google's competitors.
22	Declaration in	Pages 4:12, 4:15-16, 4:18. 4:21-	Narrowly tailored to protect confidential
23	support of	22, 371:11, 371:15, 373:24, 374:1-	technical information regarding highly
24	Google's	2, 374:5-24	sensitive features of Google's internal
25	Opposition to		systems and operations, including details
26	Plaintiffs' Request		related to internal project names, internal
27	for Sanctions		identifiers, and their proprietary
28			functionalities, that Google maintains as
			confidential in the ordinary course of its
			business and is not generally known to
			the public or Google's competitors.

**SO ORDERED.**

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DATED: \_\_\_\_\_

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HON. SUSAN VAN KEULEN  
United States Magistrate Judge